



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

**JUL 27 2011**

Christopher DeLacy, Esq.  
Holland & Knight  
2099 Pennsylvania Avenue, N.W., Suite 100  
Washington, D.C. 20006

RE: MUR 6054  
Buchanan Automotive Holdings, Inc.

Dear Mr. DeLacy:

On August 26, 2008, the Federal Election Commission notified Buchanan Automotive Holdings, Inc. of a complaint alleging violations of the Federal Election Campaign Act of 1971, as amended.

On June 28, 2011, after an investigation of the allegations in the complaint, the Commission found that there is no reason to believe Buchanan Automotive Holdings, Inc. violated 2 U.S.C. § 441f. Accordingly, the Commission closed its file in this matter as it pertains to Buchanan Automotive Holdings, Inc. The Factual and Legal Analysis, explaining the Commission's finding, is enclosed.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) remain in effect, and that this matter is still open with respect to other respondents. The Commission will notify you when the entire file has been closed.

If you have any questions, please contact Jack Gould or Michael Cofumba at (202) 694-1650.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Allen".

Mark Allen  
Assistant General Counsel

Enclosure

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**FEDERAL ELECTION COMMISSION**

**FACTUAL AND LEGAL ANALYSIS**

In the matter of )  
 ) MUR 6054  
Buchanan Automotive Holdings )

**I. GENERATION OF MATTER**

This matter was generated by a complaint filed with the Federal Election Commission ("the Commission") by Citizens for Responsibility and Ethics in Washington, Melanie Sloan, David J. Padilla, and Carlo A. Bell. See 2 U.S.C. § 437g(a)(1).

**II. INTRODUCTION**

This matter concerns campaign contributions received by Vern Buchanan for Congress ("VBFC") during the 2006 and 2008 election cycles that were reimbursed with the funds of car dealerships in which Representative Vernon Buchanan ("Buchanan") holds, or previously held, a majority ownership interest.

**III. ANALYSIS**

The Federal Election Campaign Act of 1971, as amended ("Act"), provides that no person shall make a contribution in the name of another person or knowingly permit his or her name to be used to effect such a contribution. 2 U.S.C. § 441f. The MUR 6054 Complaint alleged that Buchanan Automotive Holdings, Inc. ("BAH"), which is solely-owned by Buchanan and is the managing member of Florida limited liability companies that operate car dealerships, participated in the reimbursement of contributions. The investigation in this matter has not produced evidence that BAH violated the Act. Specifically, there is no evidence that BAH was the source of any reimbursements of contributions to VBFC.

1    **IV.    CONCLUSION**

2            The available information indicates that there is no reason to believe that Buchanan  
3    Automotive Holdings, Inc., violated 2 U.S.C. § 441f.

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